



Todd DeGrandmont <chemglider@gmail.com>

Bankruptcy Case No. 19-30088 (DM)

1 message

Todd DeGrandmont <chemglider@gmail.com>
To: PGEclaims@kbklp.com

Wed, Nov 18, 2020 at 1:48 PM

I received an email and letter explaining what I need to do to oppose the disallowance. Below is what I am supposed to address. Each item is addressed following this.

"CONTENTS OF RESPONSE The Response must, at a minimum, include the following: (i) a caption setting forth the name of the Bankruptcy Court, the name of the Reorganized Debtor, the case number and title of the Omnibus Objection to which the Response is directed; (ii) your name, the assigned number(s) of your Proof(s) of Claim, and an explanation for the amount of the Proof(s) of Claim; (iii) a concise statement setting forth the reasons why the Bankruptcy Court should not sustain the Omnibus Objection; (iv) a declaration under penalty of perjury of a person with personal knowledge of the relevant facts that support the Response; (v) your name, address, telephone number, and/or the name, address, and telephone number of your attorney and/or designated representative to whom counsel for the Reorganized Debtors should serve a reply to the Response, if any; and (vi) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the Omnibus Objection on your behalf, if any."

Each of the above is addressed below:

i) United States Bankruptcy Court, Northern District of California, San Francisco Division

Bankruptcy Case NO. 19-30088 (DM)

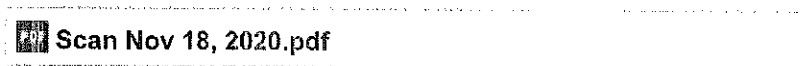
Reorganized Debtor's Response Fortieth Omnibus Objection to claims (no liability/pass through claims).

P.G.&E. Corporation and Pacific Gas and Electric Company

ii) Todd DeGrandmont claim #2370: The amount of the claim is for \$7,000.00 to replace the concrete driveway that P.G.&E. ruined by breaking two separate holes in the concrete driveway to replace a gas line.

iii) The omnibus objection made by P.G.&E. should not be sustained by the Bankruptcy Court due to their cited reason "Damage not caused by P.G.&E." It is obvious that P.G.&E. authorized the broken holes into the concrete driveway to replace the gas line and therefore did cause the damage to the irreparable driveway.

iv) *SEE ATTACHED*



vi) Todd DeGrandmont, 302 Palin Avenue, Galt, California, 95632. phone #: (916)600-5240

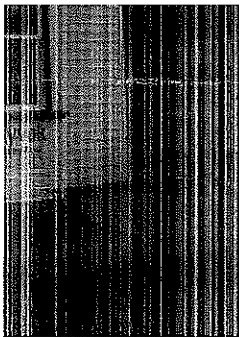
vii) Todd DeGrandmont, 302 Palin Avenue, Galt, California, 95632. phone #: (916)600-5240 email: chemglider@gmail.com

I have attached two pictures showing the two holes PG&E punched into my driveway to replace the gas line at their expense. This is evidence that PG&E caused the damage to my driveway.

2 attachments



Concrete Hole Made by PG&E (2).jpg
324K



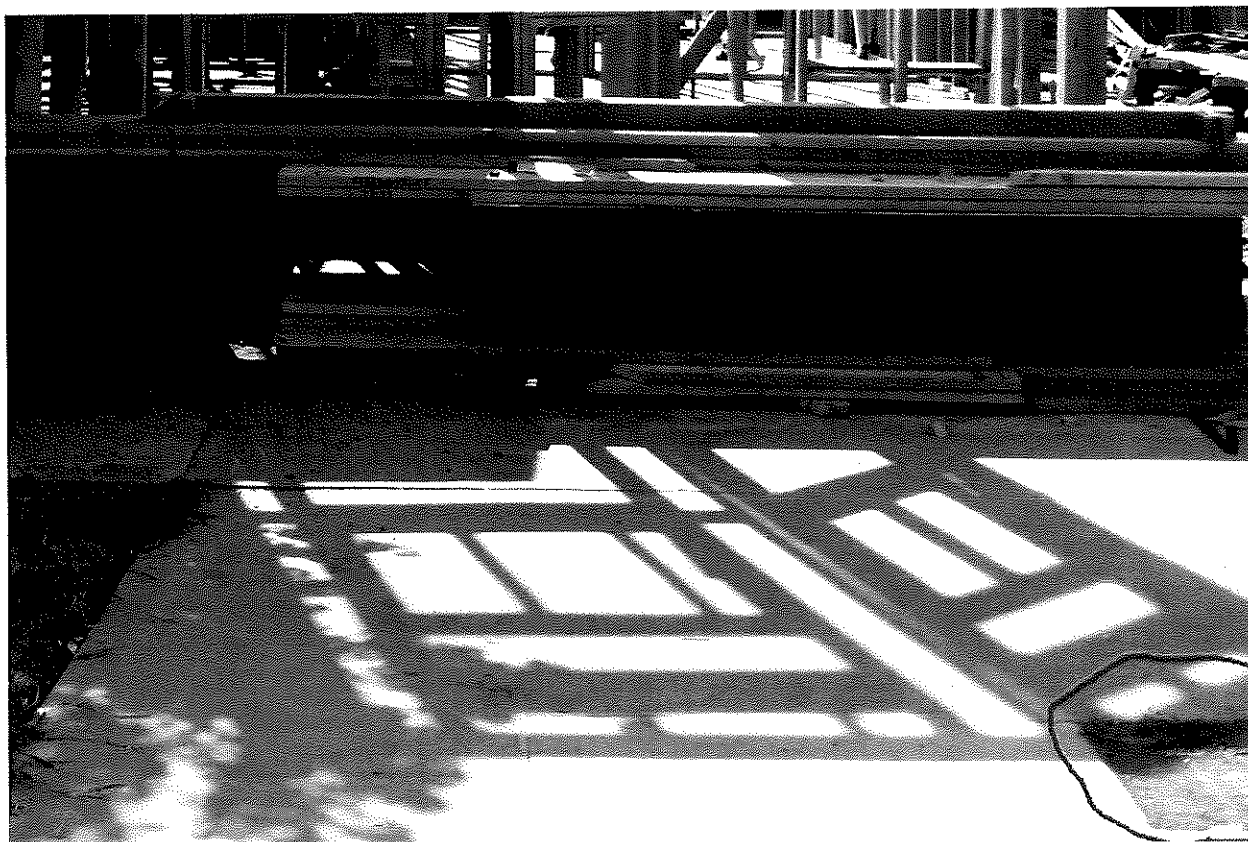
Concrete Hole With New PG&E Gas Line (2).jpg
156K

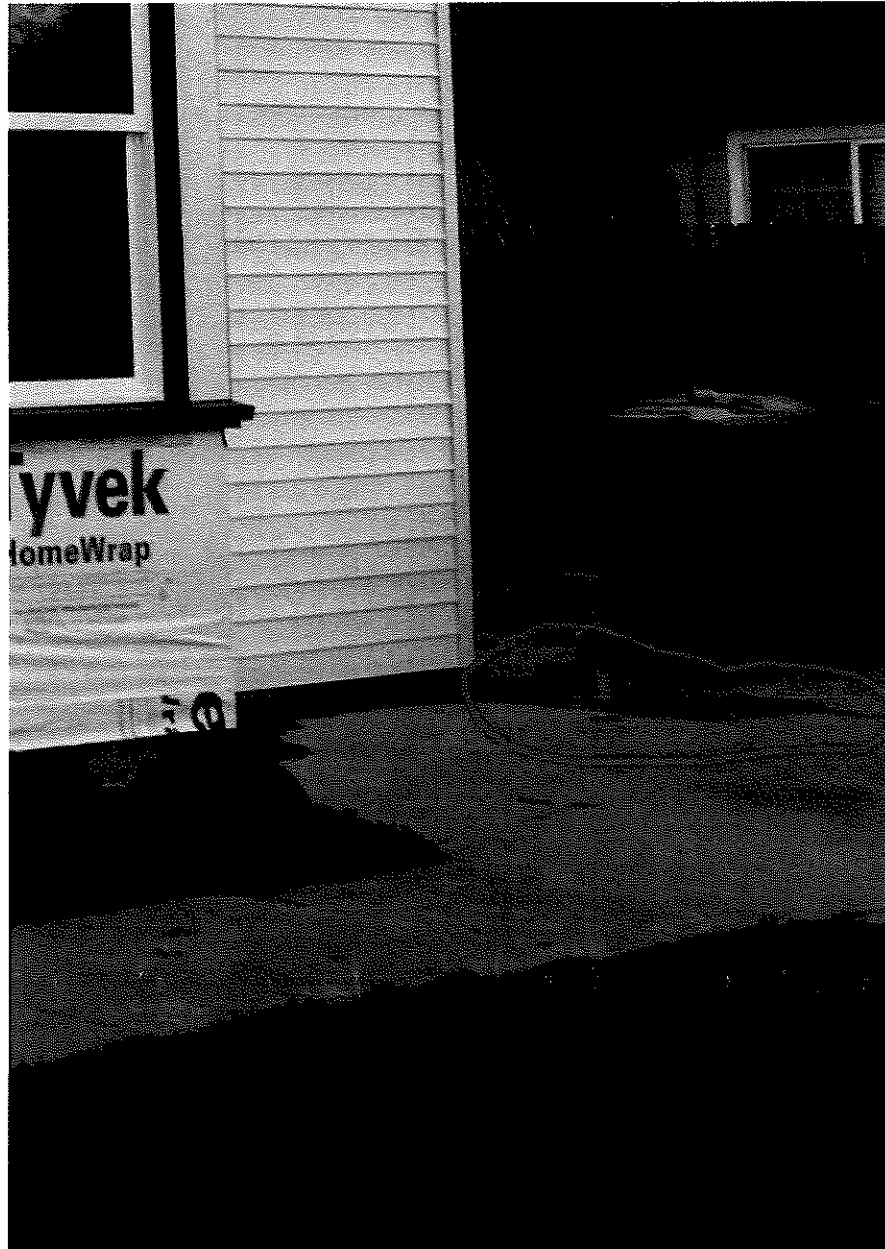
A NOTE: COLOR PRINTS ARE ATTACHED

November 18, 2020

I, Todd DeGrandmont, under penalty of perjury declare that I have personal knowledge of the relevant facts to support the response that PG&E caused the damage to the driveway of 302 Palin Avenue, Galt, California. I witnessed the two holes put into the concrete driveway to replace the pre-existing gas line at 302 Palin Avenue. The damage was never fixed by PG&E.

 11/18/20
Todd DeGrandmont





T. De Groot
302 PALM AVE.
GALT, CA. 95632

SACRAMENTO CA 957
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FOREVER / USA

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
450 GOLDEN GATE AVENUE, 18TH FLOOR
MAIL BOX 36099
SAN FRANCISCO, CA. 94102

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UNITED STATES BANKRUPTCY COURT
SAN FRANCISCO, CA

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